

**The LANE Construction Corporation
Penobscot County
Hermon, Maine
A-257-71-M-M (SM)**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #2**

After review of the air emission license amendment application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., § 344 and § 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

1. The LANE Construction Corporation (Lane) located in Hermon, Maine was issued Air Emission License A-257-71-K-R/A on January 18, 2005 permitting the operation of emission sources associated with their hot mix asphalt plant, and their crushed stone and gravel facility. The license was subsequently amended on August 2, 2005 (A-257-71-L-M).
2. Lane has requested a minor revision to their license in order to add a third oil heater, two asphalt silos, and two Portland cement storage silos.

B. Emission Equipment

The following are new equipment:

Heating Equipment

<u>Equipment</u>	<u>Maximum Capacity</u>	<u>Maximum Firing Rate</u>	<u>Fuel Type, % Sulfur</u>
HYCGO-200 (oil heater)	2.1 MMBtu/hr	15 gal/hr	#2 fuel oil, 0.5% specification waste oil, 0.7%

Cement Silos

<u>Equipment</u>	<u>Capacity (bbl)</u>	<u>Control Devices</u>
Silo #1	1,200	fabric filter
Silo #2	1,300	fabric filter

C. Application Classification

Lane has not requested an increase in the facility's annual fuel limit. This amendment will not increase permitted emissions of any pollutant. Therefore, this modification is determined to be a minor revision and has been processed as such.

II. BEST PRACTICAL TREATMENT

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (last amended December 24, 2005). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 06-096 CMR 100. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Cement Silos

To meet the requirements of BACT for control of particulate matter (PM) emissions from the cement silos, particulate emissions shall be vented through a combined single fabric filter maintained for 99% removal efficiency. Visible emissions from the cement silo fabric filter are limited to no greater than 10% opacity on a six (6) minute block average basis except for no more than one (1) six (6) minute block average in a 1-hour period. The facility shall take corrective action if visible emissions from the fabric filter exceed 5% opacity.

C. HYCGO-200 Heater

The HYCGO-200 Heater has a heat input capacity of 2.1 MMBtu/hr firing #2 fuel oil and specification fuel oil with a maximum sulfur content of 0.7% by weight. This heater will be used, in conjunction with the previously licensed heaters, to heat the facility's asphalt tanks including two new tanks. This heater has a maximum heat input of less than 10 MMBtu/hr and is therefore not subject to NSPS Subpart Dc.

A summary of the BACT analysis is the following:

1. The SO₂ emission limits are based on the firing of fuel which meets the criteria in ASTM D396 for #2 fuel oil or which meets the criteria for specification waste oil.

2. The PM and PM₁₀ limits are derived from 06-096 CMR 103.
3. NO_x emissions are based on similar units of this size and age.
4. CO, and VOC emission limits are based upon AP-42 data dated 10/96.
5. Visible emissions from the HYCGO-200 shall each not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period.

D. Facility Emissions

Lane shall be restricted to the following annual emissions, based on a 12-month rolling total basis:

Total Licensed Annual Emissions for the Facility
(used to calculate the annual license fee)

	PM	PM₁₀	SO₂	NO_x	CO	VOC
Asphalt Plant & Heaters	10.1	10.1	46.9	28.2	93.9	1.9
Genset 1	1.1	1.1	1.8	15.4	3.3	1.2
Total TPY	11.2	11.2	48.7	43.6	97.2	3.1

ORDER

The Department hereby grants Air Emission License Minor Revision A-257-71-M-M, subject to the conditions found in Air Emission License A-257-71-K-R/A, in amendment A-257-71-L-M, and in addition to the following conditions.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

The following replaces Condition 16(G) of Air Emission Licenses A-257-71-K-R/A and A-257-71-L-M:

(16) **Batch Mix Asphalt Plants**

- G. Lane shall be limited to the use of 950,000 gal/year of #2 fuel oil (0.5% sulfur maximum) and specification waste oil (0.7% sulfur maximum) on a 12 month rolling total, in the rotary dryers, CEI Heater, AC Heater 1, AC Heater 2, and HYCGO-200 heater (combined). Emissions from the baghouses for Plant #12 and #26 shall not exceed the following [MEDEP Chapter 115, BPT]:

Plant #12

<u>Pollutant</u>	<u>grs/dscf</u>	<u>lb/hr</u>
PM	0.03	7.74
PM ₁₀	n/a	7.74
SO ₂ *	n/a	36.00
NO _x	n/a	21.60
CO	n/a	72.00
VOC	n/a	1.48

*SO₂ emissions based on 0.7% sulfur specification waste oil.

Plant #26

<u>Pollutant</u>	<u>grs/dscf</u>	<u>lb/hr</u>
PM	0.03	17.55
PM ₁₀	n/a	17.55
SO ₂ *	n/a	141.0
NO _x	n/a	50.40
CO	n/a	168.00
VOC	n/a	3.44

*SO₂ emissions based on 0.7% sulfur specification waste oil.

The following are new Conditions:

(27) **Cement Silos**

- A. Particulate emissions from the cement silos shall be vented through a fabric filter and all components of the cement distribution facility shall be maintained so as to prevent PM leaks. [06-096 CMR 115, BPT]
- B. To document maintenance of the cement silo fabric filter, the licensee shall keep a maintenance log recording the date of all routine maintenance. [06-096 CMR 115, BPT]

- C. Opacity from the cement silo fabric filter is limited to no greater than 10% on a 6 minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. Lane shall take corrective action if visible emissions from the fabric filter exceed 5% opacity. [06-096 CMR 101]

(28) HYCGO-200 Heater

- A. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

Emission Unit	PM (lb/hr)	PM₁₀ (lb/hr)	SO₂ (lb/hr)	NO_x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
HYCGO-200	0.17	0.17	1.48	0.84	0.08	0.01

- B. Visible emissions from the HYCGO-200 heater shall not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [06-096 CMR 101]

Condition (25) of air emission license A-257-71-K-R/A is deleted.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2008.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAVID P. LITTELL, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-257-71-K-R/A.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 4/10/08

Date of application acceptance: 4/10/08

Date filed with the Board of Environmental Protection: _____

This Order prepared by Lynn Ross, Bureau of Air Quality.